



INTEROFFICE MEMORANDUM

DATE: February 22, 1996
TO: G. D. Guinn, Environmental Restoration Project, Bldg. T130F, X8043
FROM: T. L. Hummel, Operations Support, Bldg. T130B, X3107
SUBJECT: BUILDING 440 - IDENTIFICATION OF POTENTIAL REGULATORY ISSUES -
TLH-001-96

PURPOSE

The purpose of this memo is to list the potential Building 440 regulatory issues for the Building 440 project that were identified by G. D. Guinn during a meeting between G. D. Guinn and T. L. Hummel on February 14, 1996, and verify that the requirements have been addressed.

DISCUSSION

The following are the identified requirements and the responses:

Repack Booth

- **Action:** Verify that individuals repackaging waste are not in a ventilation air flow path which first crosses over open waste containers.
- **Response:** Per conversation with the project engineer (T. Humiston), individuals will not be in potentially contaminated air flow path.

Machinery Removal

- **Action:** Equipment containing Resource Conservation and Recovery Act (RCRA) waste must be identified and appropriate company procedures utilized before moving equipment.
- **Response:** Per conversation with the waste disposal shift manager (M. Thornton), before equipment is removed from the building, fluids will be removed. Any fluids which have RCRA constituents have been disposed of per RCRA requirements.

Excavation of Truck Ramp

- **Action:** After determining if the soil in the excavation area is contaminated, document whether the Fugitive Dust Emission Act will impact project.
- **Response:** A letter will be sent to Air Quality Management requesting determination of need for a permit.

ADMIN RECORD

Concrete Repair

- *Action:* If concrete which will be removed during construction activities is stained, verify by characterizing, whether Debris Rule applies.
- *Response:* Per conversation with the waste disposal shift manager, the concrete which will be removed is not stained.

Removal of Sprinkler Piping in the Outdoor Welding Booth

- *Action:* Determine if the composition of the valve seat in the isolation valve is lead. The Waste Stream Residue Identification and Characterization (WSRIC) group will know if the valve seat is lead by the date stamped on the valve. If lead, dispose of properly.
- *Response:* The waste disposal shift manager will check the date stamped on the valve and will contact the WSRIC group.
- *Action:* The fluid in exterior sprinkler piping is probably ethylene glycol. If it is ethylene glycol, it can be reused on plantsite.
- *Response:* Per conversation with the waste disposal shift manager, the fluid is ethylene glycol and the fluid will be recycled.

Transfer of Three Portable Offices from Building 440 to the Denver Mint

- *Action:* Contact M. Aycock to take credit for in Recycling Program.
- *Response:* The project engineer will contact M. Aycock.

Removal of Overhead Crane in Room 105

- *Action:* A thorough smear should be performed on crane before removal since it could have been utilized in another building before being used in Building 440.
- *Response:* Per conversation with the waste disposal shift manager, the crane will be thoroughly smeared prior to removal.

Removal of Two Portable Fans from Room 122 (Possibly Asbestos Removal Fans)

- *Action:* Have Industrial Hygiene check fans.
- *Response:* The project engineer will contact Industrial Hygiene. The waste disposal shift manager did not think the fans were labeled as asbestos removal fans, but will also verify.

Cooling Tower

- *Action:* Older cooling tower systems used chromate in the water for rust prevention. If the cooling tower water which will be used in the new cooling coils for cooling of the Repack Booth contains chromate, the coils may require RCRA closure when the system is taken out of service in the future.
- *Response:* The project engineer will check with the Building 460 Environmental Coordinator to determine whether the cooling water contains chromate. Because a cold water source is needed for cooling the air entering the Repack Booth, the project engineer stated that we needed to use the cooling tower water regardless of the chromate issue.

If you have any questions, please contact me at extension 3107.

dlf

cc:

R. M. Deborski
P. W. Edrich
H. N. Finkelman
T. J. Humiston
M. D. Thornton